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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

No. 3:21-cr-00172-MO-1

Plaintiff,

v.

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE
TRIAL DATE**

JORGE ROSALES,

Defendant.

Defendant Jorge Rosales, through his attorney, Francesca Freccero, moves this Court to continue the trial in the above-entitled case, which is presently scheduled for July 20, 2021, for a period of approximately 120 days to November 23, 2021, or a date thereafter convenient to the Court. This motion is made based on the need for time to receive discovery from the government, investigate the case, conduct research, and consult with Mr. Rosales regarding his case.

Mr. Rosales has sought no prior continuance of the trial date. He has not yet received discovery in his case. He remains in custody, presently housed at the Multnomah County Jail. Assistant United States Attorney Gary Sussman has no objection to the requested continuance.

Mr. Rosales previously waived time for trial. Undersigned counsel specifically discussed the instant motion with Mr. Rosales, and he requests the postponement. If this matter is continued, the time between the current trial date and November 23, 2021, will be excludable delay pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Rosales in a speedy trial because the additional time is necessary to afford Mr. Rosales the opportunity to receive and review discovery, investigate the case, conduct research, consult with counsel, and otherwise prepare his defense. As noted above, Mr. Rosales acknowledges his right to a speedy trial under the Speedy Trial Act and agrees that this motion will result in excludable delay under the Act.

Respectfully submitted on July 7, 2021.

/s/ Francesca Freccero
Francesca Freccero
Attorney for Defendant